

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GTECH CORPORATION,

Plaintiff,

v.

C.A. No. 04-138-JJF

SCIENTIFIC GAMES INTERNATIONAL,
INC.; SCIENTIFIC GAMES HOLDINGS
CORPORATION; SCIENTIFIC GAMES
FINANCE CORPORATION; and
SCIENTIFIC GAMES CORPORATION,

Defendants.

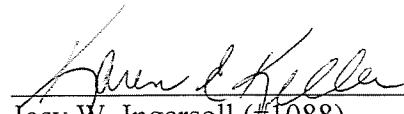
STIPULATION

IT IS HEREBY STIPULATED AND AGREED, that:

1. The parties will not offer or seek to offer opinions, conclusions or testimony from patent law experts in this action.
2. Draft expert reports generated in connection with this action need not be retained. All draft expert reports will be immune from discovery and inadmissible at trial.
3. The parties will not seek discovery of any notes prepared by experts in connection with preparation of expert reports or declarations submitted in this action, or of any communications between counsel and experts concerning this action.
4. Nothing in paragraphs 2-3 above shall preclude, or is intended to preclude, a party from seeking, and receiving, discovery of any information relied upon by an expert in rendering any opinions or conclusions in this action or relied upon in connection with an expert report or declaration submitted by that expert in this action. The parties expressly agree that discovery shall be permitted concerning anything an expert relied upon in connection with an

expert report, declaration, opinion or conclusion submitted or offered in this action, which could potentially include communications with counsel, notes made by counsel or the expert, or other materials which would otherwise be exempt from discovery under paragraphs 2-3 of this Stipulation.

YOUNG, CONAWAY, STARGATT & TAYLOR MORRIS, NICHOLS, ARSHT & TUNNELL



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